

# ★ PRET A MANGER ★

Modern Slavery Statement  
2019

## Introduction

Contributing to positive change in the world has been an ambition of Pret A Manger's since our humble beginnings as a single sandwich shop back in 1986. This means that we are naturally in full support of the UK Modern Slavery Act and the transparency it encourages, as it aligns with our efforts to do the right thing.

Pret A Manger ("Pret") recognises the complexity of modern slavery and the many forms it can take. We understand that its practice is not always immediately apparent, nor is it isolated to particular industries or specific geographical regions. Since publishing our first modern slavery statement (2016) in May 2017, we remain wholly dedicated to identifying and eradicating any instances of this unacceptable practice that may arise within the operations and supply chains of our business.

As outlined in our previous statement, 2018 was a year of significant change for Pret A Manger, as we worked to review our policies and processes on food safety and allergen labelling. This reassessment led to considerable changes across our entire business; many of which were implemented and rolled out by our teams throughout 2019. Therefore, while we are proud of the advances we have made in tackling modern slavery throughout our supply chains and operations, our progress in some areas was slower than we would have liked. We take our commitment to addressing modern slavery risks extremely seriously, and we look forward to continuing to make progress on this important topic.

In 2019, we focussed on embedding responsible sourcing practices across our supplier base, with a particular focus on non-food procurement, and strengthening provisions on team training. Some of the key steps taken during 2019 include;

- ★ Onboarding all made-to-sell packaging suppliers on Sedex, one of the largest collaborative platforms in the world for buyers, suppliers and auditors to store, share and report on supply chain information
- ★ Rolling out comprehensive modern slavery training to 95 key colleagues across the business
- ★ Embedding the new supplier registration system across the business to better capture information on suppliers so we can understand and pre-empt potential risks

*This statement has been published in accordance with the Modern Slavery Act (2015). It outlines the steps Pret A Manger has taken to prevent, identify and respond to risks of modern slavery within our direct operations and our supply chains during the financial year ending 2019.*

## **Our Organisation, Structure and Supply Chains**

Pret A Manger is an international sandwich shop chain, founded in London's Victoria in 1986. We sell a range of fresh foods and beverages, including coffee, sandwiches, soups and salads. In 2019, we grew by adding 82 shops to our portfolio. In 2019 Pret A Manger acquired EAT – another UK-based sandwich shop chain – which will be progressively integrated into the Pret A Manger business – but for the 2019 reporting year, the activities of the EAT business are covered by the legacy EAT division.

In total, we have 586 shops across 10 countries. Pret A Manger also works with 10 franchise partners, operating 41 shops across the UK (11), France (9), US (8), Denmark (3), UAE (4), Germany (1), Switzerland (4), and Singapore (1).

### **Our People**

We have over 13,000 employees across all geographies, with the majority of these in the UK. 98% of these are on permanent contracts, and 44.4% are migrants.

Pret A Manger uses a variety of methods to recruit staff, including the company website, job boards and recruitment agencies. For retail staff, we no longer use recruitment agencies as it offers more control and transparency over our recruitment process in an area that could be higher risk. For support centre staff, we try to recruit directly or, depending on the role, we use a preferred list of suppliers, with whom we have long-standing relationships.

We acknowledge that we must manage the risks that come with having a higher than average proportion of migrant workers, and some employees through recruitment agencies. All staff undergo comprehensive right to work checks prior to employment and sign general terms and conditions of employment that include clauses relating to modern slavery. We undertake monthly reporting on visa expiry dates to minimise the risk of vulnerability due to a change in right to work status. Relevant safeguards that support the identification of risk include;

- ★ Pret A Manger’s safeguarding policy
- ★ Mental health champions across the business, who create a safe space for staff to raise issues they are facing – which could include issues related to forced labour
- ★ Emphasis on thoughtful leadership, where colleagues are encouraged to spend time thinking of their teams and getting to know them as individuals

#### Number of suppliers across our key markets

	UK	France	Hong Kong	USA
Food and drink	74	22 local and 50 shared with UK supply base	67	23
Non-food <sup>1</sup>	391	34	55	263

In line with our core value of ‘*doing the right thing*’, we place great emphasis on responsible sourcing. The majority of our direct food and drink suppliers (tier one) are based in the UK (76%) and the EU (20%), with the remainder from the rest of the world (4%). Whilst the UK and EU represent lower risk in terms of modern slavery considerations, as per the 2018 Global Slavery Index, we acknowledge that monitoring, evaluating and mitigating risk is still vital. Other supply chains for products beyond tier one are global.

We are committed to fostering strong relationships with our food suppliers, and many of them have been with us since we started out with just one shop. Enduring relationships build trust and understanding, and we see this as strong foundations for food quality, safety, and social compliance in the food supply chain. Pret A Manger operates with a distinct separation between direct (food) and indirect (non-food) procurement. These are handled by different teams to ensure we can best meet the needs of the business, our suppliers, and our customers. In our non-food procurement, we have taken steps in 2019 to improve our buying practices in line with more robustly managing risks of modern slavery within our supply chains, including mandating Sedex membership for made to sell packaging suppliers and onboarding 72 non-food suppliers via our online supplier registration process which includes questions relating to supplier modern slavery practices.

---

<sup>1</sup> Non-food suppliers based on spend and criticality of items/services supplied

## The Pret Way

From the beginning, Pret A Manger has been a mission-driven and responsible business, upholding our core value of *'doing the right thing'* in everything we do. Pret A Manger's sustainability strategy forms part of this ethos. More information about this can be found at: <http://www.pret.co.uk/en-gb/sustainability>.

Pret A Manger has always been passionate about giving back to society, particularly supporting people in troubled circumstances to better their lives. Pret A Manger has been donating unsold food to the homeless since it opened its first shop in 1986. What started out as just a handful of sandwiches has now grown to over 6 million items donated through 500 charities across Pret markets in 2019.

The Pret Foundation financially supported 70 charities working with the homeless in 2019. As well as donating money, The Pret Foundation provides everything from showers and sleeping bags to food shopping and chefs. In February 2019, we opened a new house for the homeless in south London as part of The Pret Foundation's goal to break the cycle of homelessness. Throughout 2019, the house continued to provide people who were previously living on the streets with accommodation, employment and advice, preparing them for the transition into a privately rented home.

Our commitment to being a responsible business helps guide our policy framework.

## Our Policies

Pret A Manger recognises the important role that policies play in outlining the expectations of conduct in our direct operations – both in our head office and our shops – and our supply chain. Our policies reflect our commitment to *'doing the right thing'* and are designed to not just inform but guide behaviour day-to-day.

### Direct Operations

Pret's policies respect the variance of the different markets in which we operate but we ensure a good foundation of compliance by having global policies such as the anti-bribery, whistleblowing and safeguarding policies.

## Supply Chains

Our Global Sourcing Principles are in development, with significant progress planned for the coming years. They will ensure Pret A Manger's values around labour standards and treatment of people are clearly articulated to our direct suppliers and partners. Whilst we would have liked to have had these implemented in 2019, we are pleased with the progress we have made in other areas – specifically, in mandating that all suppliers, including relevant non-food suppliers like made to sell packaging, must have Sedex registration. Our Supplier Quality Manual, which covers the food supply chain for the UK and France, affirms our expectations on suppliers around social compliance, including maintaining Sedex membership.

## Embedding

Our Modern Slavery Working Group – formed in response to the Act – brings together individuals from across the business, including Legal, Procurement, Packaging, Sustainability, and Food, to guide Pret A Manger's activities relating to modern slavery, ensuring continuous progress is made and strategic focus areas are established and aligned with the wider business.

## Due Diligence

Modern slavery is a complex issue that can be difficult to detect within our operations and our supply chains. Understanding that Pret's higher than average level of migrant labour has the potential to represent risks, we ensure robust pre-employment checks, and regular monitoring of our employees' right to work credentials.

This year, we have taken steps to minimise risk within our supply chains by making Sedex membership mandatory for our made to sell packaging suppliers, following a similar step for food suppliers in 2018. We now have better data to work with in engaging suppliers and understanding our risks, and we look forward to continuing to build Sedex risk reports into our own risk assessment and due diligence processes.

All sourcing sites across the food supply chain must be an active member of Sedex with evidence of continuous improvement against their self-assessment questionnaire, and audit where relevant, to meet the yearly Sedex Members Ethical Trade Audit scorecard requirement against the 4 pillars of labour, health and safety, environment, and business ethics. Supplier

sites must have an awareness of the Pret A Manger Modern Slavery Act Statement and in addition a plan for how they can contribute to Pret A Manger's progress.

All suppliers are audited on a risk assessment basis. To work with suppliers to ensure they meet our safety and quality standards, our Supplier Quality Manual requires that all suppliers complete a gap analysis against this Manual, including assessing if a supplier has Sedex membership. Across both food and non-food procurement, we work to ensure that Sedex onboarding is an easy process for our suppliers and support smaller suppliers with the cost of registration where necessary.

We know that there is more to do in this area, and moving forward we want to explore ingredient level risk assessments to ensure that we can prioritise where we can have the greatest impact as a business in stamping out modern slavery practices within our supply chains, where they exist.

Key steps that we took during 2019 to embed modern slavery considerations across the business include;

- ★ Improved training and capacity building
  - 95 colleagues received updated training on modern slavery in 2019 through an online course
  
- ★ Strengthened expectations of suppliers
  - Embedding a new supplier onboarding process. We onboarded 72 suppliers through a new supplier questionnaire form in 2019
  - Bringing 100% of our made-to-sell packaging suppliers onto Sedex
  - Updating our Supplier Quality Manual to address modern slavery considerations
  - Modern Slavery Act compliance is included in our standard supplier terms and conditions

## Measuring our Progress

We continue to monitor our progress against the performance indicators we established in our second statement:

1. Number of employees who have participated in training on modern slavery
2. Number of suppliers onboarded through the (new) due diligence process
3. Number of high-risk suppliers engaged with through the creation of action plans

Whilst we would like to have made stronger progress on some of these indicators, we are setting in motion a greater emphasis on ensuring modern slavery risks are actively considered across the business.

## Looking Ahead

In 2020, we will seek to further embed modern slavery considerations across our business. The key areas we will seek to build on are;

- ★ Ensuring 100% Sedex membership across our critical suppliers
- ★ Developing a pilot of our Supplier Scorecards
- ★ Developing a new training programme due to a change in suppliers
- ★ Integrating the workers and suppliers associated with the old EAT business to ensure they follow Pret's best practice on managing risks of modern slavery

*Pret A Manger's 2019 Modern Slavery Statement was prepared by the Pret Modern Slavery Working Group and approved by its Executive Committee.*

Signed



P. Christou

CEO, Pret A Manger

June 2020